



WEIL, GOTSHAL & MANGES LLP
Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

Keller & Benvenutti LLP
Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

*Attorneys for Debtors
and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

CRAVATH, SWAINE & MOORE
Signed and Filed: September 17, 2019
Paul H. Zumbro (*pro hac vice*)

DENNIS MONTALI
U.S. Bankruptcy Judge
825 Fifth Avenue
New York, NY 10019
Tel: 212 474 1000
Fax: 212 474 3700

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**ORDER RE: THE PRODUCTION OF THE
BROWN GREER DATABASE**

1 The parties to the state court proceedings (JCCP No. 4955 California North Bay Fire
2 Cases), negotiated a series of integrated orders entered by Judge Curtis Karnow, coordination
3 judge JCCP 4955, parts of which addressed information concerning claimant specific damages.¹
4 The Debtors and the Tort Claimants Committee (the “TCC”) have agreed to adopt many of the
5 claimant-specific systems, procedures and individual protections ordered in the state court in
6 relation to the BrownGreer Portal. The “BrownGreer Portal” refers to the online repository that
7 was used previously in the state court proceedings (JCCP No. 4955 California North Bay Fire
8 Cases), and now as part of these Chapter 11 Cases, to store plaintiff-specific damages and claims-
9 related information, uploaded by law firms representing individual claimants related to their fire-
10 related claims.² The BrownGreer Portal contains claimant specific information that can aid the
11 parties in pursuing claimant specific valuation efforts aimed at achieving a consensual resolution
12 of all wildfire claims. BrownGreer does not independently value individual cases. While reports
13 that can be generated from the BrownGreer Portal identifying basic information about the wildfire
14 claims that are being asserted against the Debtors will not themselves provide any party to these
15 Chapter 11 Cases the answer to the global value of tort claims, the exchange of those reports from
16 the BrownGreer database will represent an important step in the process towards providing
17 relevant information that may facilitate a consensual resolution. As reflected in the attached
18 agreement, additional information will need to be entered into BrownGreer to further these efforts.

19 **IT IS HEREBY ORDERED THAT:**

20 1. Immediately upon entry of this stipulated order, and subject to the terms of this
21 stipulation and order, BrownGreer shall commence efforts to create secure portals for the Debtor,
22 the TCC and the Unsecured Creditors Committee (“UCC”).

23 2. The first reports from the BrownGreer Portal will be produced to the Debtor, TCC
24

25 ¹ The parties to the state court orders included the debtor, the individual plaintiffs, the insurance
carriers, and the public entities.

26 ² The insurance carriers and the individual plaintiffs previously agreed to continue the state court
27 systems in this bankruptcy and apply the same systems to the Camp Fire. The individual
28 plaintiffs continued to work within the BrownGreer Portal in order to provide the claimants a
better opportunity for inclusion and participation in this bankruptcy and to obtain important
insurance data and information under CMO 5.

1 and the UCC on September 16th subject to the terms of the agreement.

2 3. The Ad Hoc Equity Group represented by the Jones Day firm may have access to
3 BrownGreer reports through the Debtor, and the Ad Hoc Committee of Senior Unsecured
4 Noteholders represented by the Akin Gump firm may have access to BrownGreer reports through
5 the UCC.

6 4. Access will be subject to confidentiality agreements and protective orders with
7 respect to the case specific information.

8 5. The full terms of the agreement between the TCC and the Debtors are attached as
9 Exhibit A to this stipulation and proposed order.

10 6. The TCC and the Debtor have agreed to meet and confer to discuss formal claimant
11 specific damages discovery that may be necessary in connection with estimation proceedings in
12 the absence of a consensual resolution. (*See* Paragraph 9 to the Attached Agreement).

13
14 **** END OF ORDER ****
15
16
17
18
19
20
21
22
23
24
25
26
27
28